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May 27, 2004

BY FIRST CLASS MAIL

The Honorable Robert E. Keeton
U.S. District Court
for the District of Massachusetts
One Courthouse Way
Boston, MA 02110

Re: ZipWall, LLC v. C & S Manufacturing, Inc.
Civil Action No.: 04-CV-10079 (REK)

Dear Judge Keeton:

ZipWall, LLC ("ZipWall") is in receipt of the Reply to Motion for Leave to Withdraw from Representation that counsel for C&S Manufacturing, Inc. ("C&S") filed yesterday with the Court. C&S did not request leave to file this additional paper, as required by Local Rule 7.1(b)(3), nor did it confer with counsel as required under section (a)(2) of the same rule. ZipWall does not object, however, to the filing of the reply and would have assented to a motion for leave had C&S asked.

In its brief, C&S states that requiring its Illinois counsel to "fly to Boston" for the June 9, 2004 scheduling conference would be "unnecessarily burdensome." Reply Br. at 3. In order to alleviate any burden, ZipWall would consent to local counsel appearing at the hearing without its lead counsel from Illinois. ZipWall would also agree to lead counsel appearing by telephone.

Sincerely yours,

LOWRIE, LANDO & ANASTASI, LLP

Emily A. Berger

cc: Tina M. Traficanti, Robins, Kaplan, Miller & Ciresi L.L.P.
Eric P. Martin, Grossman & Flight, LLC